



SANTA CRUZ COUNTY GROUP

of the Ventana Chapter

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Robert Tidmore
Santa Cruz County Parks
979 17th Avenue
Santa Cruz, CA 95062

August 12, 2024

Re: Moran Lake Monarch Butterfly Habitat Management Plan Update

Dear Mr. Tidmore,

The Sierra Club has reviewed the Moran Lake Monarch Butterfly Habitat Management Plan Update and offers the following comments.

The Sierra Club supports adoption of the Plan Update. The revised (July 2024) Plan Update represents a noticeable improvement over the initial draft, and the Sierra Club expects to recommend to the Board of Supervisors that the Update be adopted, with the modifications and conditions outlined herein.

A limitation of the current Plan Update is its devaluing of the southeast/ocean side of the lagoon. The windbreak value of that location is portrayed as less than critical, based upon current roost locations. This change foregoes the opportunity to restore the failed North Lakeside Roost Area. The Sierra Club urges you to revise this section and to replant the southern areas with windbreak capable trees.

The Plan Update now includes a more accurate accounting of current roost sites, but it is not as descriptive of former roost sites which have now failed due to tree loss, a plan component that should be improved to prevent future failures in-kind.

The Plan Update does include Count Statistics demonstrating the importance of the Moran Lake habitat, which supports approximately one fourth of the County's Monarch population. The Plan Update better discusses replacement tree species and selection criteria.

Although this Plan Update represents a robust level of work, it is important to point out that the original Monarch Butterfly Habitat Management Plan was adopted by the Board of Supervisors in early 2011. The updated Plan lists tree recent tree removals at 3.5.1, yet this is only a partial list of removals by the County since the original Plan was adopted. The original Plan requires a minimum of 2:1 replacement for tree removals, yet these replacement plantings *have yet to be done* for the listed tree removals. The original Plan identified urgent drainage improvements necessary to counteract man-made changes that cause water ponding and tree loss, yet no such improvements have been implemented in the 13.5 years since the original Plan was adopted. All these failings must be speedily rectified in the updated Plan's text and the County's implementation action.

The County has delayed required mitigation planting both from private developers, whose remitted funds still languish unspent in County coffers, and from the County's own removals; these delays are inexcusable, to say the least. The Plan Update should not be approved unless it includes an implementing workplan, with a budget, schedule, and funding sources. Replacement plantings already paid for by private developers, and replacement plantings required to mitigate the County's own removals require no supplemental funding, the County is legally and morally obligated to implement these plantings without further delay.

The Sierra Club appreciates the opportunity to comment on this Plan Update. Thank you for considering our concerns.

Sincerely,

Kristen Sandel, Conservation Committee

Steve Bakaley, Executive Committee

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